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FILED
Clerk
District Court

JUL 25 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT
FOR
THE NORTHERN MARIANA ISLANDS

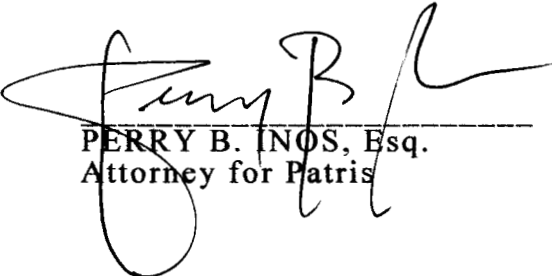
UNITED STATES OF AMERICA,
Plaintiff,
v.
CHARLEY PATRIS, et al.,
Defendants.

Criminal Case No. 04-00038

DEFENDANT PATRIS'
PROPOSED VOIRE DIRE
QUESTIONS

COMES NOW the Defendant, by and through counsel, and submits his
proposed *voir dire* attached hereto.

Dated this 25 day of July, 2005.



PERRY B. INOS, Esq.
Attorney for Patris

PATRIS' PROPOSED VOIR DIRE QUESTIONS

A. **PERSONAL**

1. What is your name?
2. What is your date of birth? / How old are you?
3. How long have you lived in the CNMI?
4. Please explain for us the nature and extent of your educational background, including any special training courses and vocational seminars you have attended. If you attended college, what was your major field of study?
5. Have any of you ever studied law or had any legal training? If so,
 - a. When did you receive this training?
 - b. What was the extent of your training?
 - c. Could you set aside what you have learned and decide the case based on the evidence and the law as given in this case?

B. **FAMILY**

1. Are you married? If so, what is your spouse's name?
2. If not married, do you live together with another person whom you consider a common-law spouse?
3. Do you live alone?
4. Do you share a house with another person or persons?
5. Do you have children? If so, how old are they?
6. Are they in public or private school?

1 **C EMPLOYMENT**

- 2 1. Are you employed? If so, who is your employer?
- 3 2. Please describe the nature of the job that you do?
- 4 3. How long have you been employed in your present job?
- 5 4. Who were your previous employers?
- 6 5. Is your spouse employed? If so, what is the nature of the employment? Who
- 7 is the employer?
- 8

9 **D. RELATIONSHIP WITH WITNESSES OR PARTIES AND THEIR**

10 **FAMILY**

- 11 1. Are any of you friendly or associated or related with the attorneys for the
- 12 Government or for the defense in this case, either socially or through your role
- 13 as jurors in other cases? If so, please explain the nature of your contact and
- 14 how it may affect your attitude as a juror in this case?
- 15
- 16 2. Do any of you know any of the witnesses who will testify? If so, please
- 17 describe your acquaintance. If you know any of these people, would you be
- 18 able to set aside that acquaintanceship and be guided by the evidence presented
- 19 in this case and by the law given by the Judge?
- 20
- 21 3. Do any of you know any of the defendants or their family members socially or
- 22 through some business or other relationship or acquaintanceship? If so, please
- 23 describe the relationship or acquaintanceship?
- 24
- 25 4. Would it be embarrassing and perhaps even painful to have to return a verdict
- 26 against the defendant when you are so acquainted with any of the defendants or
- 27 their family?
- 28

5. Is there any other reason why you could not sit as a juror in this case because of who the defendant is, his family, or any witness that may testify in this case?

E. GENERAL INFORMATION

1. Do you have any children who is employed by DPS, CNMI Immigration, CNMI Customs or any law enforcement agency? If so, who and with what law enforcement agency? How long is the employment, to your knowledge?
2. Have you served in the United States Armed Forces?
3. What branch of the service? When and where did you serve?
4. What are your special interests, hobbies and recreational pursuits?
5. Have you or your relatives or close friends ever been the victim of a crime? If so, who was the victim?
 - a. What was the nature of the crime?
 - b. When did the crime occur?
 - c. Was the crime solved?
 - d. Was there a person charged with the crime or did the case go to court?
 - e. Did you testify at the trial?
 - f. What was the result of the trial?
6. Has any of you ever witnessed the commission of a crime?
 - a. What type of crime?
 - b. What was the outcome of the case?
 - c. Would you be influenced in any way by your experience as a witness to a crime?

7. Have you ever served on a jury before? Please explain your past experience on juries in both civil and criminal cases. Tell us when the case was tried and the nature of the case. Without telling me whether or not the jury found the defendant guilty or not guilty, please tell me whether or not the jury actually reached a verdict. Would you be influenced in any way by your previous experience as a juror?
8. Is there anything about the subject of this case, that is, allegations about possession of Methamphetamine Hydrochloride also known as "ice", perjury, theft, conspiracy that makes you not want to be involved in the trial of this case?
9. Do you have any fixed view about defendants that have been arrested by law enforcement officers that would affect your ability to be an impartial juror in this case?
10. Would you tend to believe the testimony of a witness just because that witness is a law enforcement officer and for no other reason?

E. PUBLICITY

1. Do you read any local newspaper regularly?
2. Do you watch the local news on television regularly?
3. Do you tend to believe most of what you read or hear and watch in the local news?
4. Have you heard or had any conversation about this case with anyone? If so, what did you hear or talk about?

1 5. Did you believe what you heard or talked about?

2 6. Can you set aside all of the information, impressions or opinions you have
3 about the case and decide this case only on the evidence that will be presented
4 to you during the course of the trial and on the instructions you will receive
5 from the Court?
6

7
8 **F. GENERAL QUALIFICATIONS**

9 1. Do you believe a person is guilty because he has been arrested by an
10 enforcement officer?

11 2. Do you tend to believe a person is guilty because she is charged by the U.S.
12 Attorney's Office?

13 3. Do you tend to believe a person is guilty because he is on trial for being
14 charged with having committed a crime?
15

16 4. Do you think the Government can arrest and charge an innocent person with a
17 crime?

18 5. Do you believe that law enforcement officers never make a mistake?

19 6. Do you believe that a person is innocent if he is on trial for being charged with
20 having committed a crime?
21

22 7. Do you believe a person charged with a crime is guilty if that person does not
23 testify at trial?

24 8. Has anyone attempted to influence you in any way about this case since you
25 were notified that you may be on the jury panel? Who? When? Who else was
26 present? What did you say?
27
28

9. Before you were so notified, did anyone attempt to influence you about jury service on this matter? Please tell us the details of the event.
10. If you are selected to sit on this case, will you be able to render a verdict solely on the evidence presented at trial and the law as it is given to you?
11. If selected as a juror, can you disregard any ideas, notions or beliefs about the facts or the law that you may have earlier encountered or formed?
12. Do you have any physical conditions which would make it difficult for you to serve?